

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Matthew Lennon,

Plaintiff,

v.

Experian Information Solutions, Inc.,

Defendant.

Civil Action No.: 2:24-cv-05548

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**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1441, *et seq.*, Experian Information Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-captioned action to this Court and states as follows:

1. Experian is named as a Defendant in Civil Action Docket No. 2024-21912 in the Montgomery County Court of Common Pleas in the Commonwealth of Pennsylvania (the “State Court Action”).

2. The Complaint in the State Court Action (the “Complaint”) was filed on September 16, 2024, but was not served on Experian at that time.

3. On October 2, 2024, Experian was served via mail with the Complaint, which is attached as **Exhibit A**.

4. No other pleadings in the State Court Action have been served on Experian.

5. This Notice of Removal is timely filed with this Court within thirty (30) days of service of the Complaint.

6. This Court is the proper district court for removal because the State Court Action is pending within this district.

7. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

8. The claims for relief against Experian alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681, *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and § 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

9. Promptly after the filing of this Notice of Removal and pursuant to 28 U.S.C. § 1446(d), Experian shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, and shall file a copy of this Notice with the Clerk of the Court in the State Action.

Dated: October 18, 2024

Respectfully submitted,

/s/ Mohammad A. Ghiasuddin

Mohammad A. Ghiasuddin, Esq.

Pa. Bar No. 83925

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*Counsel for Defendant*

*Experian Information Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on Plaintiff's counsel by mail at the following address:

Brett M. Freeman, Esquire  
FREEMAN LAW  
606 Hamlin Highway, Suite 2  
Lake Ariel, PA 18436

Respectfully submitted,

/s/ Mohammad A. Ghiasuddin  
*Counsel for Defendant*  
*Experian Information Solutions, Inc.*